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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JAMES M. CLEAVENGER,

Case No. 6:13-cv-01908-DOC

Plaintiff,

**DEFENDANTS' PROPOSED
AMENDED VERDICT FORM**

vs.

**UNIVERSITY OF OREGON (an Agency and
Instrumentality of the State of Oregon), et al.,**

Defendants.

Defendants propose the attached amended verdict form.

DATED this 22nd day of September, 2015.

HARRANG LONG GARY RUDNICK P.C.

By: s/ Andrea D. Coit
Andrea D. Coit, OSB #002640
Jonathan M. Hood, OSB #133872
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JAMES M. CLEAVERGER,

Case No. 6:13-cv-01908-DOC

Plaintiff,

VERDICT

vs.

**CAROLYN MCDERMED, BRANDON
LEBRECHT AND SCOTT CAMERON,**

Defendants.

1. Did Scott Cameron issue Plaintiff a negative performance evaluation in retaliation for Plaintiff's speech about Tasers that he engaged in in 2008?

Yes

No

2. Did Scott Cameron issue Plaintiff a written reprimand in retaliation for Plaintiff's speech about Tasers that he engaged in in 2008?

Yes

No

3. Did Brandon Lebrecht submit the Brady information regarding Plaintiff to the District Attorney on June 17, 2014 in retaliation for Plaintiff:

a. complaining about ___ during his meeting(s) with Carolyn McDermed on June 1, 2012 or August 13, 2012, or in the lawsuit he filed in November, 2013?

Yes

No

b. complaining about _____ during his meeting(s) with Carolyn McDermed on June 1, 2012 or August 13, 2012, in the lawsuit he filed in November, 2013?

_____ Yes

_____ No

4. Did Carolyn McDermed recommend Mr. Cleavenger's termination from employment at UOPD in retaliation for:

a. complaining about _____ during his meeting(s) with her on June 1, 2012 or August 13, 2012 or in the lawsuit he filed in November, 2013?

_____ Yes

_____ No

b. complaining about _____ during his meeting(s) with her on June 1, 2012 or August 13, 2012, or in the lawsuit he filed in November 2013?

_____ Yes

_____ No.

5. Did Carolyn McDermed instruct Brandon Lebrecht to submit the Brady information regarding Plaintiff to the District Attorney on June 17, 2014 in retaliation for:

a. complaining about _____ during his meeting(s) with her on June 1, 2012 or August 13, 2012 or in the lawsuit he filed in November, 2013?

_____ Yes

_____ No

b. complaining about _____ during his meeting(s) with her on June 1, 2012 or August 13, 2012 or in the lawsuit he filed in November, 2013?

_____ Yes

_____ No

If you answered Yes to any of the above questions, proceed to question 6.

6. What are the plaintiff's damages?

\$_____ Economic damages

\$_____ Non-economic damages

\$_____ Nominal damages

Proceed to Question 7.

7. Should the plaintiff be awarded punitive damages?

_____ Yes

_____ No

If your answer is Yes, proceed to Question 8.

If your answer is No, do not answer Question 8. Your presiding juror should sign the verdict form and summon the court clerk.

8. What is the amount of punitive damages?

\$_____

Your presiding juror should sign the verdict form and summon the court clerk.

THIS IS THE UNANIMOUS VERDICT OF WE, THE JURY.

DATED: September _____, 2015.

Presiding Juror

CERTIFICATE OF SERVICE

I certify that on September 22, 2015, I served or caused to be served a true and complete copy of the foregoing **DEFENDANTS' PROPOSED AMENDED VERDICT FORM** on the party or parties listed below as follows:

- Via CM / ECF Filing
- Via First Class Mail, Postage Prepaid
- Via Email
- Via Personal Delivery

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CERTIFICATE OF SERVICE